



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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NAS BRUNSWICK
5090.3a

JOHN ELIAS BALDACCI

GOVERNOR

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COMMISSIONER

January 30, 2008

Mr. Orlando Monaco
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Site 17, Monitoring Event 26-September 2007
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the draft "Site 17 (Building 95), Monitoring Event 26 Report-September 2007", dated December 2007, prepared by Environmental Chemical Corporation. Based on that review MEDEP has the following comments and issues.

General Comments:

1. The data for Monitoring Event (ME) 26 – Fall 2007 are consistent with the past few years of monitoring. The lone detection was a 4,4'-DDD detection (0.056J µg/L and 0.058 µg/L - duplicate) at MW-NASB-67, well below the Maine Maximum Exposure Guideline (MEG) of 1 µg/L for DDT and its breakdown products. In general water quality has improved since the sporadic detections of pesticides at MW-NASB-097 in 2001 – 2004, with a few detections at the three site wells. (No response required.)
2. MEDEP anticipates that the electronic data deliverable for Site 17 will be included in a submittal of data for all long-term monitoring (LTM) sites.

Specific Comments:

3. Section 2.2 and field parameter tables: Please add a note in the tables section that defines the "average" dotted lines in the graphs.
4. Appendix B – Field Forms: The "black-colored" water noted at MW-NASB-097 the day it was pouring is unusual. The field parameters and laboratory results do not indicate anything anomalous in the data. What is the Navy's explanation for the color? Is it associated with roadbed material or miscellaneous fuel runoff? MEDEP noted that the picture showing the repair to the roadbox at this location appeared to have dark soil around it, although it may simply be wet rather than stained.

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5. Appendix F, Temporal Trend Graphs: In MEDEP hard copy of Appendix F every other one graph is up side down. Please fix this in the final copy and electronic copy, if necessary.
6. Section 3.2, Recommendations: The recommendation to discontinue monitoring in 2008 is reasonable given the upcoming investigation this year, and the lack of significant groundwater detections over the last 6 rounds. However, MEDEP cannot agree to discontinuing the monitoring of groundwater entirely as long as buried hazardous waste remains at the site. MEDEP is open to a discussion of a reduction in monitoring, perhaps to a spring and fall round every other year. If the Remedial Investigation is completed this year then the required groundwater monitoring will be revisited, and further revisions to the LTMP are likely. MEDEP has requested that this topic be discussed at the upcoming February 5, 2008 conference call.

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,



Claudia Sait
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Bureau of Remediation & Waste Management

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